

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

AMERICAN PATENTS LLC,

Plaintiff,

v.

MEDIATEK INC., ET AL.,

Defendants.

CIVIL ACTION NO. 6:18-cv-339

JURY TRIAL DEMANDED

OPPOSED MOTION FOR ENTRY OF FORM PROTECTIVE ORDER

Plaintiff American Patents LLC respectfully submits this Motion for Entry of Protective Order to allow for disclosure of confidential information to technical experts and consultants while protecting both parties' confidential information.

The Court may enter appropriate protective orders to restrict access to confidential information. *See* Fed. R. Civ. P. 26(c)(1)(G). The Local Rules provide that “[u]pon motion by any party demonstrating good cause, the court may enter a protective order in the form set out in Appendix H or any other appropriate form. In cases where the parties agree to a protective order, the form set out in Appendix H is approved.” Local Rule CV-26(c).

American believes that Appendix H is more than sufficient to protect all parties' confidential information. American thus moves the Court to enter a protective order in the form of Appendix H to the Local Rules. (**Exhibit A** to this motion is a version of Appendix H that has been modified only to add the case caption and to reflect that this is an opposed, not joint, motion.)

Good cause exists to enter the Court's form protective order (i.e., Appendix H) in this case at least because it sets forth a procedure for allowing experts and consultants to review confidential information and otherwise presents a presumptively “appropriate” set of protections

for the parties' confidential information. *See* Local Rule CV-26(c). Good cause also exists because on August 30 Defendants must produce, among other things, their technical documents showing the operation of the accused products. Dkt. 121 at 2. Plaintiff needs its technical experts and consultants to have access to those documents to assist Plaintiff in preparing for the claim construction process, which begins shortly thereafter.

Plaintiff has conferred with defendants, who state that they oppose this motion and will submit their own protective order at some point in the future.

Dated: August 12, 2019

Respectfully submitted,

/s/ Larry D. Thompson, Jr.

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